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13 Attorneys for Defendants  
14 MARLOU CORP D/B/A CLUB PLATINUM AND  
RITA CAPOVILLA

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

17 LINDA WHEELER and KARISSA ANN  
18 HUGH, individually, and on behalf of similarly  
situated individuals.

19 || Plaintiffs

20 || V.

21 MARLOU CORPORATION d/b/a CLUB  
22 PLATINUM, a Nevada corporation, and RITA  
CAPOVILLA.

23 || Defendants.

Case No. 2:23-cv-01556-APG-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANTS TO FILE RESPONSIVE  
PLEADING TO PLAINTIFFS'  
COMPLAINT**

[FIRST REQUEST]

25 Plaintiffs, LINDA WHEELER and KARISSA ANN HUGH, (“Plaintiffs”), and Defendants,  
26 MARLOU CORP D/B/A CLUB PLATINUM AND RITA CAPOVILLA (“Defendants”), by and  
27 through their undersigned counsel, and pursuant to LR IA 6-1, hereby agree and stipulate to extend  
28 the time for Defendants to file a response to the Complaint from the current deadline of October 27,  
4853-6753-8570.1 / 122709-1001

1 2023, up to and including **November 16, 2023**. This is the first request for an extension of time to  
2 respond to the Complaint. The instant request for an extension is necessary because defense counsel  
3 was recently retained and needs additional time to investigate the allegations and prepare a sufficient  
4 responsive pleading to the Complaint.

5 This request is made in good faith and not for the purpose of delay.  
6

7 Dated: October 27, 2023

Dated: October 27, 2023

9 Respectfully submitted,

Respectfully submitted,

11 */s/ Sean W. McDonald*

12 KRISTINA L. HILLMAN, ESQ.  
13 SEAN W. MCDONALD, ESQ.  
WEINBERG, ROGER, ROSENFIELD, P.C.

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Attorneys for Defendants  
MARLOU CORP D/B/A CLUB  
PLATINUM AND RITA CAPOVILLA

18 **IT IS SO ORDERED.**

19 Dated: 10/31/2023

22 *Brenawetka*  
23 UNITED STATES MAGISTRATE  
JUDGE